

FILED UNDER SEAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff,

v.

**ZTE CORPORATION, ZTE (USA)
INC., AND ZTE (TX), INC.**

Defendants.

§ **CIVIL ACTION NO. 6:20-cv-487-ADA**
§ **CIVIL ACTION NO. 6:20-cv-488-ADA**
§ **CIVIL ACTION NO. 6:20-cv-489-ADA**
§ **CIVIL ACTION NO. 6:20-cv-490-ADA**
§ **CIVIL ACTION NO. 6:20-cv-491-ADA**
§ **CIVIL ACTION NO. 6:20-cv-492-ADA**
§ **CIVIL ACTION NO. 6:20-cv-493-ADA**
§ **CIVIL ACTION NO. 6:20-cv-494-ADA**
§ **CIVIL ACTION NO. 6:20-cv-495-ADA**
§ **CIVIL ACTION NO. 6:20-cv-496-ADA**
§ **CIVIL ACTION NO. 6:20-cv-497-ADA**

JURY TRIAL DEMANDED

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MOTION FOR LEAVE TO FILE SUR-REPLY

WSOU Investments (“WSOU”) respectfully requests leave to file the attached sur-reply (Exhibit A¹) opposing ZTE USA’s and ZTE TX’s renewed motion to dismiss or transfer. WSOU requests leave to file a sur-reply to: [REDACTED]

[REDACTED] but that was not produced until after WSOU filed its response; and (2) briefly address arguments made in ZTE’s reply brief.

¹ While this document and Exhibit A are being filed in each of the above captioned cases, to preserve resources, the remaining exhibits are being filed only in the -487 case.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]²

[REDACTED]

² ZTE did not produce any of the Gogo contracts. WSOU obtained them from public sources and from Gogo.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

WSOU did not receive Amendment No. 4 until it was produced by Gogo after WSOU filed its response. It should have been produced by ZTE at least before Mr. Wood's May 26, 2020 deposition. Therefore, WSOU respectfully seeks leave to file the attached sur-reply, which addresses the significance of Amendment No. 4 and briefly addresses other arguments raised in ZTE's reply.

Dated: July 1, 2021

Respectfully submitted,

By: /s/ Ryan Loveless
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Counsel for Plaintiff WSOU Investments, LLC

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via the U.S. District Court [LIVE]-Document Filing System to all counsel of record July 1, 2021.

/s/ Ryan Loveless

Ryan S. Loveless

CERTIFICATE OF CONFERENCE

Counsel for WSOU conferred with counsel for ZTE by email on June 30, 2021. The parties did not agree and ZTE is opposed to the relief requested.

/s/ Ryan Loveless

Ryan S. Loveless